



DEPARTMENT OF THE NAVY
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From: Commanding Officer, Navy Environmental Health Center
To: Commanding Officer, Atlantic Division, Naval Facilities Engineering Command
(Kirk Stevens), 1510 Gilbert Street, Norfolk, VA 23511-2699

Subj: MEDICAL REVIEW OF PILOT STUDY PROJECT PLANS SITE 73, OPERABLE
UNIT 21, MARINE CORPS BASE CAMP LEJEUNE, NC

Ref: (a) Michael Baker Jr., Inc. ltr of 28 Jul 03

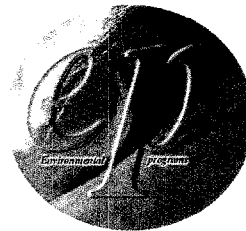
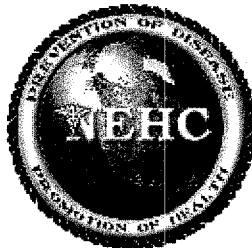
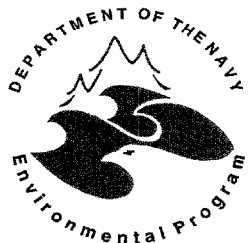
Encl: (1) Subject Medical Review

1. Per reference (a), we have completed a review of the subject document and forward our comments to you as enclosure (1).
2. We are available to discuss the enclosed information by telephone with you and, if you desire, with you and your contractor. If you require additional assistance, please call Mr. Kenneth Gene Astley at (757) 953-0937 or Mr. David McConaughy at (757) 953-0942. The DSN prefix is 377. The e-mail addresses are: astleyg@nehc.med.navy.mil and mcconaughyd@nehc.med.navy.mil.

C. P. RENNIX

By direction

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MCB Camp Lejeune (ACS EMD/IRP, Rick Raines)



NAVY ENVIRONMENTAL HEALTH CENTER ENVIRONMENTAL PROGRAMS DIRECTORATE

Pilot Study Review

Location: Camp Lejeune, North Carolina

Site: Site 73, Operable Unit 21

Work Description: Work Plan, Field Sampling and Analysis Plan, and a Quality Assurance Project Plan

Document Date: July 2003

Contract No./Contract Task Order No.: N62470-89-D-6007/0253

EP Document No.: 4443

Prepared for: LANTNAVFACENGCOM

Prepared by: CH2M Hill Federal Group, Ltd. and Michael Baker Jr., Inc.

Date Received: 1 August 2003

Reviewed by:

Kenneth Gene Astley, (757) 953-0937, astleyg@nehc.med.navy.mil, DSN 377

**MEDICAL REVIEW OF
DRAFT PILOT STUDY PROJECT PLANS SITE 73, OPERABLE UNIT 21
MARINE CORPS BASE
CAMP LEJEUNE, NORTH CAROLINA**

General Comments:

1. The document entitled "Draft Pilot Study Project Plans Site 73, Operable Unit 21 Marine Corps Base Camp Lejeune, North Carolina," was provided to the Navy Environmental Health Center (NAVENVIRHLTHCEN) for review on 1 August 2003. The report was prepared for Atlantic Division, Naval Facilities Engineering Command by CH2M Hill Federal Group, Ltd and Michael Baker Jr., Inc.
2. The text states on Page 3-1, concerning the objective of the pilot study, that "Because current concentrations have indicated a downward TCE [trichloroethene] trend, it is proposed that the target area for this pilot test is expanded to the current 100 ug/L [microgram per liter] TCE..." The text should discuss, in greater detail, what effect the naturally occurring bioremediation will have on the interpretation of the pilot study results.
3. The text work plan does not identify potential contaminant-specific, location-specific, and action-specific Applicable or Relevant and Appropriate Requirements (ARARs) based on the conceptual site model and preliminary alternatives considering all federal, state, and local laws, regulations, criteria, advisories, and guidance.
4. The field sampling and analysis plan should state that, before the start of sampling activities, plastic sheeting should be placed on the ground surrounding the well. The plastic sheeting should be used to provide a clean working area around the well head, and prevent any soil contaminants from contacting sampling equipment.
5. The field sampling and analysis plan should state that, when monitoring well sampling is being conducted, those wells expected to have low levels of contamination or no contamination be sampled prior to those wells expected to have higher levels of contamination. This practice will help reduce the potential for cross contamination between wells.
6. The text should state if this groundwater sampling data will be used in a human health risk assessment. The Data Quality Objectives are excellent for characterizing the length, depth, and extent of contamination but can be inappropriate for a human health risk assessment.